

1 WRIGHT, FINLAY & ZAK, LLP  
2 Ramir M. Hernandez, Esq.  
3 Nevada Bar No. 13146  
4 7785 W. Sahara Ave., Suite 200  
5 Las Vegas, NV 89117  
6 (949) 477-5050; Fax: (702) 946-1345  
7 [rhernandez@wrightlegal.net](mailto:rhernandez@wrightlegal.net)  
8 *Attorneys for Conn Appliances, Inc.*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 LISA ESPITIA,

9 Plaintiff,

10 vs.

11 EXPERIAN INFORMATION SOLUTIONS,  
12 INC.; CONN APPLIANCES, INC. and  
13 SYNCHRONY BANK,

14 Defendants.

Case No.: 2:23-cv-00028-RFB-VCF

**JOINT MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
PLAINTIFF'S COMPLAINT (FIRST  
REQUEST)**

15 Plaintiff, Lisa Espitia ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Defendant")  
16 (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as  
17 follows:

18 On January 5, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with  
19 Plaintiff's Complaint on January 9, 2023. The deadline for Defendant to respond to Plaintiff's  
20 Complaint is January 30, 2023. The Parties have discussed extending the deadline for Defendant  
21 to respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss  
22 possible resolution of the matter.

23 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to  
24 file its responsive pleading to Plaintiff's Complaint to March 1, 2023.

25 This is the first motion for an extension of time for Defendant to file its responsive  
26 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to  
27 any other party.

28 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that

occurs during the pendency of this extension.

DATED this 30th day of January, 2023.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

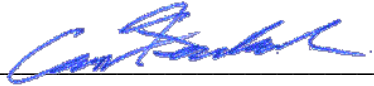
/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

Ramir M. Hernandez, Esq.  
Nevada Bar No. 13146  
7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117  
*Attorneys for Defendant, Conn Appliances,  
Inc.*

Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
8985 S. Eastern Ave. Suite 350  
Las Vegas, NV 89123  
*Attorneys for Plaintiff, Lisa Espitia*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 2-6-2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 30th day of January, 2023, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP